

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**TYANA JOHNSON, Individually and  
on Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs.

No. 2:23-cv-10601

**CELEBRITY MANAGEMENT COMPANY,  
and NICHOLAS FARANSO**

**DEFENDANTS**

**PLAINTIFF'S MOTION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Plaintiff Tyana Johnson, by and through her attorneys Daniel Ford and Josh Sanford of Sanford Law Firm, PLLC, in support of her Motion for Voluntary Dismissal without Prejudice, does state as follows:

1. Plaintiff filed her Original Complaint – Collective Action on March 14, 2023. ECF No. 1.
2. Although properly served, Defendants never answered Plaintiff's Complaint.
3. It is the desire of Plaintiff to voluntarily dismiss without prejudice all of her claims currently pending in this case.
4. Plaintiff Tyana Johnson hereby requests that the Court dismiss her claims without prejudice.

WHEREFORE, premises considered, Plaintiff Tyana Johnson respectfully requests that the Court dismiss this case without prejudice; and for all other good and proper relief to which she may be entitled, whether or not specifically requested herein.

Respectfully submitted,

**PLAINTIFF TYANA JOHNSON**

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